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JUL 29 2009

AT 8:00

WILLIAM T. WALSH, CLERK

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**

v. :

RAUL HERNANDEZ, :
RUBEN SEPULVEDA, and : Mag. No. 09-6135
RAMON MARTINEZ-RUIZ :

I, the undersigned complainant, being duly sworn, state that the following is true and correct to the best of my knowledge and belief. On or about July 28, 2009, in Union County, in the District of New Jersey and elsewhere, defendants RAUL HERNANDEZ, RUBEN SEPULVEDA, and RAMON MARTINEZ-RUIZ did:

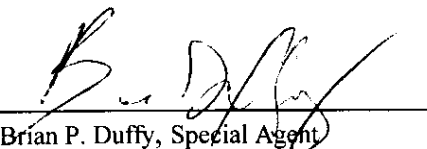
knowingly and intentionally conspire with each other, and with others, to distribute and possess with the intent to distribute 5 kilograms or more of cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

In violation of Title 21, United States Code, Section 846.

I further state that I am a Special Agent of the Department of Homeland Security, Bureau of Immigration and Customs Enforcement, and that this complaint is based on the following facts:

SEE ATTACHMENT A

continued on the attached page and made a part hereof.



Brian P. Duffy, Special Agent
United States Immigration and Customs Enforcement

Sworn to before me and subscribed in my presence,

July 29, 2009, at Newark, New Jersey

HONORABLE MICHAEL A. SHIPP
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

I, Brian P. Duffy, a Special Agent of the Department of Homeland Security, Immigration and Customs Enforcement ("ICE"), following an investigation, am aware of the following facts:

1. On or about July 28, 2009, pursuant to an ongoing investigation, ICE special agents seized approximately 6.8 kilograms of a white, powdery substance that field tested positive for cocaine, in a hotel room in Elizabeth, New Jersey.
2. Also on that date, defendant RUBEN SEPULVEDA and RAMON MARTINEZ-RUIZ arrived in the parking lot of the hotel in a light-colored minivan. Defendant RAUL HERNANDEZ arrived at the same time in a dark-colored Crown Victoria. ICE special agents observed defendant HERNANDEZ get out of the Crown Victoria and retrieve a suitcase from the trunk of that vehicle. ICE special agents observed defendant MARTINEZ-RUIZ get out of the minivan and have a brief conversation with defendant HERNANDEZ, who appeared to gesture to MARTINEZ-RUIZ to wait there.
3. Defendant HERNANDEZ walked to the door of the hotel room in which ICE special agents had seized the narcotics and knocked on the door. ICE special agents then detained HERNANDEZ, SEPULVEDA, and MARTINEZ-RUIZ.
4. A search of the suitcase that defendant HERNANDEZ was carrying revealed that it was empty except for approximately \$10,600 in cash.
5. In post-arrest statements, defendant HERNANDEZ stated in substance and in part that he was doing a favor for a friend. Defendant SEPULVEDA stated in substance and in part that he was at the hotel to partake in a narcotics transaction and that HERNANDEZ and MARTINEZ-RUIZ were also there to partake in a narcotics transaction.